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| DOC #:                 |
| DATE FILED: 10/23/2019 |

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

03-MDL-1570(GBD)(SN)

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

-----X

This document relates to:

*Kim et al. v. Islamic Republic of Iran*, No. 18-CV-11870 (GBD) (SN);  
*DeRubbio et al. v. Islamic Republic of Iran*, No. 18-CV-05306 (GBD) (SN);  
*Kamardinova et al. v. Islamic Republic of Iran*, No. 18-CV-05339 (GBD) (SN);  
*Hemenway et al. v. Islamic Republic of Iran*, No. 18-CV-12277 (GBD) (SN);  
*Jimenez et al. v. Islamic Republic of Iran*, No. 18-CV-11875 (GBD) (SN);  
*Rowenhorst et al. v. Islamic Republic of Iran*, No. 18-CV-12387 (GBD) (SN);  
*O'Neill et al., v. Islamic Republic of Iran*, No. 04-CV-01076 (GBD) (SN);  
*Aamoth et al. v. Islamic Republic of Iran*, No. 18-CV-12276 (GBD) (SN);  
*Abel et al. v. Islamic Republic of Iran*, No. 18-CV-11837 (GBD) (SN).

**ORDER**

Upon consideration of Plaintiffs' Motion for Leave to File Iran Notices of Amendment

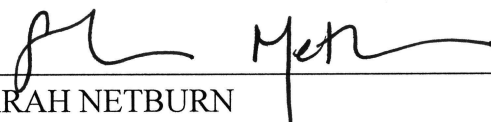
*Nunc Pro Tunc*, in the above-captioned matters, it is hereby;

ORDERED that the Plaintiffs' motion is granted;

ORDERED that Plaintiffs may file the Iran Notices of Amendment *Nunc Pro Tunc*,

attached hereto as Exhibits A – I.

**SO ORDERED.**

  
\_\_\_\_\_  
SARAH NETBURN  
United States Magistrate Judge

October 23, 2019  
New York, New York

# EXHIBIT A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

03-MDL-1570(GBD)(SN)

In re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

IRAN NOTICE OF  
AMENDMENT NUNC  
PRO TUNC

-----X

This document relates to:

*Kim et al. v. Islamic Republic of Iran*, No. 18-CV-11870 (GBD) (SN)

Plaintiffs file this Notice of Amendment *Nunc Pro Tunc* as of September 10, 2019 (“Notice of Amendment”), with respect to the underlying Complaint in the above-referenced matter, ECF No. 1, as amended by ECF Nos. 46, 47, as permitted and approved by the Court’s Order of July 10, 2018, ECF No. 4045, and the Court’s Order granting leave to file Notice of Amendment *Nunc Pro Tunc* dated \_\_\_\_\_, 2019, ECF No. \_\_\_\_\_. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended *nunc pro tunc* as of September 10, 2019, to add the individual(s) listed below (the “New Plaintiff(s)”) as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed further amended, to include the allegations of the Amended Complaint, *Burnett v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at *Havlish v. Bin Laden*, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; *In re Terrorist Attacks on September 11, 2001*, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

#### **CAUSES OF ACTION**

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and any jury trial demand, including all causes of action against Iran, as set forth in the Amended Complaint, *Burnett v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53, and in the Complaint *Kim et al. v. Islamic Republic of Iran*, No. 18-CV-11870 (GBD) (SN), ECF No. 1, as amended by ECF Nos. 46, 47.

### IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

|   | <b>New Plaintiff's Name<br/>(alphabetical by last name)</b> | <b>New Plaintiff's State of Residency at Filing (or death)</b> | <b>New Plaintiff's Citizenship/ Nationality on 9/11/2001</b> | <b>9/11 Decedent's Name</b> | <b>New Plaintiff's Relationship to 9/11 Decedent</b> | <b>Paragraphs of Complaint Discussing 9/11 Decedent</b> |
|---|---|--|--|-----------------------------|--|---|
| 1 | Florio, John  | Florida  | USA  | Florio, John Joseph         | Parent   | N/A   |
| 2 | Kiel, Elizabeth Ann   | New Jersey   | USA  | Florio, John Joseph         | Sibling  | N/A   |

Dated: \_\_\_\_\_

Respectfully submitted,

*Jerry S. Goldman*

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Jerry S. Goldman  
 ANDERSON KILL P.C.  
 1251 Avenue of the Americas  
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 Telephone: 212-278-1000  
[jgoldman@andersonkill.com](mailto:jgoldman@andersonkill.com)

*Attorney for Plaintiffs*

# EXHIBIT B

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

03-MDL-1570(GBD)(SN)

In re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

IRAN NOTICE OF  
AMENDMENT NUNC  
PRO TUNC

-----X

This document relates to:

*DeRubbio et al. v. Islamic Republic of Iran*, No. 18-CV-05306 (GBD) (SN)

Plaintiffs file this Notice of Amendment *Nunc Pro Tunc* as of September 11, 2019 (“Notice of Amendment”), with respect to the underlying Complaint in the above-referenced matter, ECF No. 20, as amended by ECF Nos. 60, 79 as permitted and approved by the Court’s Order of July 10, 2018, ECF No. 4045, and the Court’s Order granting leave to file Notice of Amendment *Nunc Pro Tunc* dated \_\_\_\_\_, 2019, ECF No. \_\_\_\_\_. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended *nunc pro tunc* as of September 11, 2019, to add the individual(s) listed below (the “New Plaintiff(s)”) as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed further amended to include all allegations of the Amended Complaint, *Burnett v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as

specified below; all causes of action contained within that complaint; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at *Havlish v. Bin Laden*, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; *In re Terrorist Attacks on September 11, 2001*, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

#### **CAUSES OF ACTION**

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and any jury trial demand, including all causes of action against Iran, as set forth in the Amended Complaint, *Burnett v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53, and in the Complaint, *DeRubbio et al. v. Islamic Republic of Iran*, No. 18-CV- 05306 (GBD) (SN), as amended by ECF Nos. 60, 79.

**IDENTIFICATION OF NEW PLAINTIFFS**

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

|   | <b>New Plaintiff's Name<br/>(alphabetical by last name)</b> | <b>New Plaintiff's State of Residency at Filing (or death)</b> | <b>New Plaintiff's Citizenship/ Nationality on 9/11/2001</b> | <b>9/11 Decedent's Name</b> | <b>New Plaintiff's Relationship to 9/11 Decedent</b> | <b>Paragraphs of Complaint Discussing 9/11 Decedent</b> |
|---|---|--|--|-----------------------------|--|---|
| 1 | Geraghty, Timothy   | New York   | United States  | Geraghty, Edward F.         | Sibling  | N/A   |

Dated: \_\_\_\_\_

Respectfully submitted,

/s/ Jerry S. Goldman  
 Jerry S. Goldman  
 ANDERSON KILL P.C.  
 1251 Avenue of the Americas  
 New York, New York 10020  
 Telephone: 212-278-1000  
 jgoldman@andersonkill.com

*Attorney for Plaintiffs*

# EXHIBIT C

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

03-MDL-1570(GBD)(SN)

In re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

IRAN NOTICE OF  
AMENDMENT NUNC  
PRO TUNC

-----X

This document relates to:

*Kamardinova et al. v. Islamic Republic of Iran*, No. 18-CV-05339 (GBD) (SN)

Plaintiffs file this Notice of Amendment *Nunc Pro Tunc* as of September 4, 2019 (“Notice of Amendment”), with respect to the underlying Complaint in the above-referenced matter, ECF No. 6, as amended by ECF Nos. 10, 18 – 20, 60, 79, as permitted and approved by the Court’s Order of July 10, 2018, ECF No. 4045, and the Court’s Order granting leave to file Notice of Amendment *Nunc Pro Tunc* dated \_\_\_\_\_, 2019, ECF No. \_\_\_\_\_. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended *nunc pro tunc* as of September 4, 2019, to add the individual(s) listed below (the “New Plaintiff(s)”) as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed further amended, to include the allegations of the Amended Complaint, *Burnett v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at *Havlish v. Bin Laden*, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; *In re Terrorist Attacks on September 11, 2001*, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

#### **CAUSES OF ACTION**

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and any jury trial demand, including all causes of action against Iran, as set forth in the Amended Complaint, *Burnett v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53, and in the Complaint, *Kamardinova et al. v. Islamic Republic of Iran*, No. 18-CV-05339 (GBD) (SN), ECF No. 6, as amended by ECF Nos. 10, 18 – 20, 60, 79.

**IDENTIFICATION OF NEW PLAINTIFFS**

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

|   | <b>New Plaintiff's Name<br/>(alphabetical by last name)</b> | <b>New Plaintiff's State of Residency at Filing (or death)</b> | <b>New Plaintiff's Citizenship/ Nationality on 9/11/2001</b> | <b>9/11 Decedent's Name</b> | <b>New Plaintiff's Relationship to 9/11 Decedent</b> | <b>Paragraphs of Complaint Discussing 9/11 Decedent</b> |
|---|---|--|--|-----------------------------|--|---|
| 1 | Kelly, Dennis T.  | Connecticut  | United States  | Kelly, Thomas William       | Sibling  | N/A   |
| 2 | Kelly, William J.   | New Jersey   | United States  | Kelly, Thomas William       | Sibling  | N/A   |
| 3 | Paglia, Maureen Bernadette                                  | New Jersey   | United States  | Kelly, Thomas William       | Sibling  | N/A   |

Dated: \_\_\_\_\_

Respectfully submitted,

*/s/ Jerry S. Goldman*

---

Jerry S. Goldman  
 ANDERSON KILL P.C.  
 1251 Avenue of the Americas  
 New York, New York 10020  
 Telephone: 212-278-1000  
 jgoldman@andersonkill.com

*Attorney for Plaintiffs*

# EXHIBIT D

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

03-MDL-1570(GBD)(SN)

In re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

IRAN NOTICE OF  
AMENDMENT NUNC  
PRO TUNC

-----X

This document relates to:

*Hemenway et al. v. Islamic Republic of Iran*, No. 18-CV-12277 (GBD) (SN)

Plaintiffs file this Notice of Amendment *Nunc Pro Tunc* as of September 4, 2019 (“Notice of Amendment”), with respect to the underlying Complaint in the above-referenced matter, ECF No. 1, permitted and approved by the Court’s Order of July 10, 2018, ECF No. 4045, and the Court’s Order granting leave to file Notice of Amendment *Nunc Pro Tunc* dated \_\_\_\_\_, 2019, ECF No. \_\_\_\_\_. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended *nunc pro tunc* as of September 4, 2019, to add the individual(s) listed below (the “New Plaintiff(s)”) as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed further amended to include all allegations of the Amended Complaint, *Burnett v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at *Havlish v. Bin Laden*, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; *In re Terrorist Attacks on September 11, 2001*, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

#### **CAUSES OF ACTION**

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and any jury trial demand, including all causes of action against Iran, as set forth in the Amended Complaint, *Burnett v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53, and in the Complaint, *Hemenway et al. v. Islamic Republic of Iran*, No. 18-CV-12277 (GBD) (SN), ECF No. 1.

**IDENTIFICATION OF NEW PLAINTIFFS**

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

|   | <b>New Plaintiff's Name<br/>(alphabetical by last name)</b> | <b>New Plaintiff's State of Residency at Filing (or death)</b> | <b>New Plaintiff's Citizenship/ Nationality on 9/11/2001</b> | <b>9/11 Decedent's Name</b> | <b>New Plaintiff's Relationship to 9/11 Decedent</b> | <b>Paragraphs of Complaint Discussing 9/11 Decedent</b> |
|---|---|--|--|-----------------------------|--|---|
| 1 | Kloepfer, Casey   | New York   | United States  | Kloepfer, Ronald            | Child  | N/A   |
| 2 | Kloepfer, Dawn  | New York   | United States  | Kloepfer, Ronald            | Spouse   | N/A   |
| 3 | Kloepfer, Taylor  | New York   | United States  | Kloepfer, Ronald            | Child  | N/A   |
| 4 | Real, Jaime   | New York   | United States  | Kloepfer, Ronald            | Child  | N/A   |
| 5 | Santimays, Wendy Ann  | Connecticut  | United States  | Kloepfer, Ronald            | Sibling  | N/A   |

Dated: \_\_\_\_\_

Respectfully submitted,

/s/ Jerry S. Goldman

Jerry S. Goldman  
ANDERSON KILL P.C.  
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New York, New York 10020  
Telephone: 212-278-1000  
jgoldman@andersonkill.com

*Attorney for Plaintiffs*

# EXHIBIT E

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

03-MDL-1570(GBD)(SN)

In re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

IRAN NOTICE OF  
AMENDMENT NUNC  
PRO TUNC

-----X

This document relates to:

*Jimenez et al. v. Islamic Republic of Iran*, No. 18-CV-11875 (GBD) (SN)

Plaintiffs file this Notice of Amendment *Nunc Pro Tunc* as of September 13, 2019 (“Notice of Amendment”), with respect to the underlying Complaint in the above-referenced matter, ECF No. 6, as amended by ECF No. 39, as permitted and approved by the Court’s Order of July 10, 2018, ECF No. 4045, and the Court’s Order granting leave to file Notice of Amendment *Nunc Pro Tunc* dated \_\_\_\_\_, 2019, ECF No. \_\_\_\_\_. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended *nunc pro tunc* as of September 13, 2019, to add the individual(s) listed below (the “New Plaintiff(s)”) as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed further amended, to include the allegations of the Amended Complaint, *Burnett v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at *Havlish v. Bin Laden*, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; *In re Terrorist Attacks on September 11, 2001*, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

#### **CAUSES OF ACTION**

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and any jury trial demand, including all causes of action against Iran, as set forth in the Amended Complaint, *Burnett v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53, and in the Complaint, *Jimenez et al. v. Islamic Republic of Iran*, No. 18-CV-11875 (GBD) (SN), ECF No. 6, as amended by ECF No. 39.

### IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

|   | <b>New Plaintiff's Name<br/>(alphabetical by last name)</b> | <b>New Plaintiff's State of Residency at Filing (or death)</b> | <b>New Plaintiff's Citizenship/ Nationality on 9/11/2001</b> | <b>9/11 Decedent's Name</b> | <b>New Plaintiff's Relationship to 9/11 Decedent</b> | <b>Paragraphs of Complaint Discussing 9/11 Decedent</b> |
|---|---|--|--|-----------------------------|--|---|
| 1 | McMahon, Anthony B.   | Australia  | United States  | McMahon, Robert Dismas      | Sibling  | N/A   |
| 2 | McMahon, Irene  | New York   | United States  | McMahon, Robert Dismas      | Sibling  | N/A   |

Dated: \_\_\_\_\_

Respectfully submitted,

/s/ Jerry S. Goldman

Jerry S. Goldman  
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1251 Avenue of the Americas  
New York, New York 10020  
Telephone: 212-278-1000  
jgoldman@andersonkill.com

*Attorney for Plaintiffs*

# EXHIBIT F

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

03-MDL-1570(GBD)(SN)

In re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

IRAN NOTICE OF  
AMENDMENT NUNC  
PRO TUNC

-----X

This document relates to:

*Rowenhorst et al. v. Islamic Republic of Iran*, No. 18-CV-12387 (GBD) (SN)

Plaintiffs file this Notice of Amendment *Nunc Pro Tunc* as of September 13, 2019 (“Notice of Amendment”), with respect to the underlying Complaint in the above-referenced matter, ECF No. 1, as amended by ECF No. 40, as permitted and approved by the Court’s Order of July 10, 2018, ECF No. 4045, and the Court’s Order granting leave to file Notice of Amendment *Nunc Pro Tunc* dated \_\_\_\_\_, 2019, ECF No. \_\_\_\_\_. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended *nunc pro tunc* as of September 13, 2019, to add the individual(s) listed below (the “New Plaintiff(s)”) as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed further amended, to include the allegations of the Amended Complaint, *Burnett v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at *Havlish v. Bin Laden*, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; *In re Terrorist Attacks on September 11, 2001*, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

#### **CAUSES OF ACTION**

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and any jury trial demand, including all causes of action against Iran, as set forth in the Amended Complaint, *Burnett v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53, and in the Complaint, *Rowenhorst et al. v. Islamic Republic of Iran*, No. 18-CV-12387 (GBD) (SN), ECF No. 1, as amended by ECF No. 40.

### IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

|   | <b>New Plaintiff's Name<br/>(alphabetical by last name)</b> | <b>New Plaintiff's State of Residency at Filing (or death)</b> | <b>New Plaintiff's Citizenship/ Nationality on 9/11/2001</b> | <b>9/11 Decedent's Name</b> | <b>New Plaintiff's Relationship to 9/11 Decedent</b> | <b>Paragraphs of Complaint Discussing 9/11 Decedent</b> |
|---|---|--|--|-----------------------------|--|---|
| 1 | Sikorsky, Marie   | New York   | United States  | Sikorsky, Gregory           | Spouse   | N/A   |
| 2 | Sikorsky, Steven  | New York   | United States  | Sikorsky, Gregory           | Child  | N/A   |

Dated: \_\_\_\_\_

Respectfully submitted,

/s/ Jerry S. Goldman

Jerry S. Goldman  
 ANDERSON KILL P.C.  
 1251 Avenue of the Americas  
 New York, New York 10020  
 Telephone: 212-278-1000  
 jgoldman@andersonkill.com

*Attorney for Plaintiffs*

# EXHIBIT G

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

03-MDL-1570(GBD)(SN)

In re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

IRAN NOTICE OF  
AMENDMENT  
NUNC PRO TUNC

-----X

This document relates to:

*O'Neill et al., v. Islamic Republic of Iran*, No. 04-CV-01076 (GBD) (SN)

Plaintiffs file this Notice of Amendment *Nunc Pro Tunc* as of September 3, 2019 (“Notice of Amendment”), with respect to the underlying Complaint in the above-referenced matter, ECF No. 67 as amended by ECF Nos. 433, 456, as permitted and approved by the Court’s Order of July 10, 2018, ECF No. 4045, and the Court’s Order granting leave to file Notice of Amendment *Nunc Pro Tunc* dated \_\_\_\_\_, 2019, ECF No. \_\_\_\_\_. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended *nunc pro tunc* as of September 3, 2019, to add the individual(s) listed below (the “New Plaintiff(s)”) as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed further amended, to include the allegations of the Amended Complaint, *O'Neill et al. v. Islamic Republic of Iran*, No. 1:04-CV-01076 (GBD)(SN) (S.D.N.Y. June. 7, 2005), ECF No. 67 as amended by ECF Nos. 433, 456. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at *Havlish v. Bin Laden*, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; *In re Terrorist Attacks on September 11, 2001*, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

#### **CAUSES OF ACTION**

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and any jury trial demand, including all causes of action against Iran, as set forth in the Complaint *O'Neill et al. v. Islamic Republic of Iran*, No. 1:04-CV-01076 (GBD) (SN), ECF No. 67, as amended by ECF Nos. 433, 456.

**IDENTIFICATION OF NEW PLAINTIFFS**

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

|   | <b>New Plaintiff's Name<br/>(alphabetical by last name)</b>                     | <b>New Plaintiff's State of Residency at Filing (or death)</b> | <b>New Plaintiff's Citizenship/ Nationality on 9/11/2001</b> | <b>9/11 Decedent's Name</b> | <b>New Plaintiff's Relationship to 9/11 Decedent</b> | <b>Paragraphs of Complaint Discussing 9/11 Decedent</b> |
|---|---|--|--|-----------------------------|--|---|
| 1 | O'Neill, Christine, as Personal Representative of the Estate of John F. O'Neill | New Jersey   | United States  | O'Neill, Sr., John P.       | Parent (Deceased)                                    | N/A   |

Dated: \_\_\_\_\_

Respectfully submitted,

*/s/ Jerry S. Goldman*

\_\_\_\_\_  
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*Attorney for Plaintiffs*

# EXHIBIT H

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

03-MDL-1570(GBD)(SN)

In re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

IRAN NOTICE OF  
AMENDMENT  
NUNC PRO TUNC

-----X

This document relates to:

*Aamoth et al. v. Islamic Republic of Iran*, No. 18-CV-12276 (GBD) (SN)

Plaintiffs file this Notice of Amendment *Nunc Pro Tunc* as of September 4, 2019 (“Notice of Amendment”), with respect to the underlying Complaint in the above-referenced matter, ECF No. 1, as amended by ECF Nos. 41 – 43, as permitted and approved by the Court’s Order of July 10, 2018, ECF No. 4045, and the Court’s Order granting leave to file Notice of Amendment *Nunc Pro Tunc* dated \_\_\_\_\_, 2019, ECF No. \_\_\_\_\_. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended *nunc pro tunc* as of September 4, 2019, to add the individual(s) listed below (the “New Plaintiff(s)”) as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed further amended, to include the allegations of the Amended Complaint, *Burnett v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as

specified below; all causes of action contained within that complaint; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at *Havlish v. Bin Laden*, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; *In re Terrorist Attacks on September 11, 2001*, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

#### **CAUSES OF ACTION**

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and any jury trial demand, including all causes of action against Iran, as set forth in the Amended Complaint, *Burnett v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53, and in the Complaint, *Aamoth et al. v. Islamic Republic of Iran*, No. 18-CV-12276 (GBD) (SN), ECF No. 1 as amended by ECF Nos. 41 – 43.

**IDENTIFICATION OF NEW PLAINTIFFS**

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

|   | <b>New Plaintiff's Name<br/>(alphabetical by last name)</b> | <b>New Plaintiff's State of Residency at Filing (or death)</b> | <b>New Plaintiff's Citizenship/ Nationality on 9/11/2001</b> | <b>9/11 Decedent's Name</b> | <b>New Plaintiff's Relationship to 9/11 Decedent</b> | <b>Paragraphs of Complaint Discussing 9/11 Decedent</b> |
|---|---|--|--|-----------------------------|--|---|
| 1 | Casalduc, Yon-Paul  | New York   | United States  | Casalduc, Vivian            | Child  | N/A   |

Dated: \_\_\_\_\_, 2019

Respectfully submitted,

*/s/ Jerry S. Goldman*

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 jgoldman@andersonkill.com

*Attorney for Plaintiffs*

# EXHIBIT I

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

03-MDL-1570(GBD)(SN)

In re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

IRAN NOTICE OF  
AMENDMENT NUNC  
PRO TUNC

-----X

This document relates to:

*Abel et al. v. Islamic Republic of Iran*, No. 18-CV-11837 (GBD) (SN)

Plaintiffs file this Notice of Amendment *Nunc Pro Tunc* as of September 10, 2019 (“Notice of Amendment”), with respect to the underlying Complaint in the above-referenced matter, ECF No. 1, as amended by ECF No. 38, as permitted and approved by the Court’s Order of July 10, 2018, ECF No. 4045, and the Court’s Order granting leave to file Notice of Amendment *Nunc Pro Tunc* dated \_\_\_\_\_, 2019, ECF No. \_\_\_\_\_. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended *nunc pro tunc* as of September 4, 2019, to add the individual(s) listed below (the “New Plaintiff(s)”) as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed further amended, to include the allegations of the Amended Complaint, *Burnett v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as

specified below; all causes of action contained within that complaint; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at *Havlish v. Bin Laden*, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; *In re Terrorist Attacks on September 11, 2001*, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

#### **CAUSES OF ACTION**

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and any jury trial demand, including all causes of action against Iran, as set forth in the Amended Complaint, *Burnett v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53, and in the Complaint, *Abel et al. v. Islamic Republic of Iran*, No. 18-CV-11837 (GBD) (SN), ECF No. 1, as amended by ECF No. 38.

**IDENTIFICATION OF NEW PLAINTIFFS**

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

|   | <b>New Plaintiff's Name<br/>(alphabetical by last name)</b> | <b>New Plaintiff's State of Residency at Filing (or death)</b> | <b>New Plaintiff's Citizenship/ Nationality on 9/11/2001</b> | <b>9/11 Decedent's Name</b> | <b>New Plaintiff's Relationship to 9/11 Decedent</b> | <b>Paragraphs of Complaint Discussing 9/11 Decedent</b> |
|---|---|--|--|-----------------------------|--|---|
| 1 | Berisha, Preta  | New Jersey   | United States  | Camaj, Roko                 | Sibling  | N/A   |
| 2 | Camaj, Frank  | New Jersey   | United States  | Camaj, Roko                 | Sibling  | N/A   |
| 3 | Camaj, Kole   | New York   | United States  | Camaj, Roko                 | Sibling  | N/A   |

Dated: \_\_\_\_\_

Respectfully submitted,

/s/ Jerry S. Goldman

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